

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

**Joaquin PLANCARTE-Ramirez (52)****Juventino Rosas, Guanajuato, Mexico**

Case No.

L-21-MJ-

*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 13, 2021 in the county of Webb in the  
Southern District of Texas, the defendant(s) violated:

*Code Section*

18 USC 1544

*Offense Description*

did willfully and knowingly use, or attempt to use, a passport issued or designed for the use of  
 another;

This criminal complaint is based on these facts:

On or about March 13, 2021, at approximately 4:00 am, defendant, Joaquin PLANCARTE-Ramirez, a citizen & national of Mexico, applied for admission into the United States at the Juarez Lincoln Port of Entry in Laredo, Texas. At time of inspection, defendant presented a United States Passport Card bearing the name of S.P. & claimed to be such person to primary CBP Officer Leroy Boardman. Subject was referred due to CBP Systems yielding a facial mismatch on the document presented & a Mexican Voter's registration card being found in the defendant's wallet bearing the defendant's name & photograph. During secondary inspection defendant insisted to CBP Officers that he was S.P. a United States Citizen. The defendant's sister was contacted & via a photograph taken at secondary inspection she was able to identify the defendant as Joaquin PLANCARTE-Ramirez & not S.P. Defendant stated that he had obtained a Mexican Electoral card with the identity of J.P.R. due to corruption in Mexico. The true owner of the document (S.P.) has a criminal history record while the defendant's biometric prints are negative. Facts are based on the defendant's sworn statement and records of Customs & Border Protection. The defendant was paroled into the United States and an Immigration hold has been placed.

☐ Continued on the attached sheet.
/s/ Cynthia C. O'Bryant*Complainant's signature*Cynthia C. O'Bryant, CBP Enforcement Officer*Printed name and title*

Sworn to before me and signed in my presence.

Date: March 15, 2021*Judge's signature*City and state: Laredo, TexasChristopher Dos Santos, U.S. Magistrate Judge*Printed name and title*